

IN THE UNITED STATES DISTRICT COURT
FOR THE DISTRICT OF MONTANA
BUTTE DIVISION

COTTONWOOD ENVIRONMENTAL)
LAW CENTER, *et al.*) Case No. 2:21-CV-00093-BMM
)
)
Plaintiffs,)
) DECLARATION OF
vs.) CRAIG MATHEWS
)
YELLOWSTONE MOUNAIN CLUB,)
LLC)
)
Defendants.)
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_____) _____

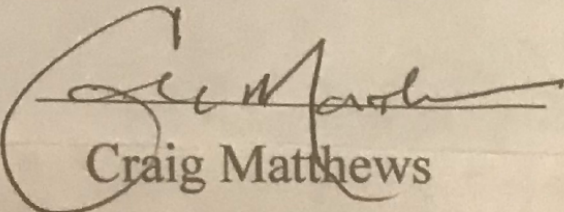
I, Craig Matthews, pursuant to 28 U.S.C. § 1746, hereby declare as follows:

1. I have personal knowledge of the matters stated herein and, if called as a witness, would competently testify.
2. I submit this declaration on my own behalf and as a member of Cottonwood Environmental Law Center (“Cottonwood”).
3. As a member of Cottonwood, I donate time and money to the organization.
4. I currently live south of Ennis, Montana.

5. I am the co-founder of One Percent for the Planet, a 501(c)(3) non-profit and global movement inspiring businesses and individuals to support environmental solutions through annual memberships and everyday actions.
6. I am the founder and former owner of Blue Ribbon Flies in West Yellowstone, Montana.
7. I am a former trapper and the Police Chief of West Yellowstone.
8. I am interested in protecting the Gallatin River and its tributaries because of what it means both symbolically and ecologically. The Gallatin forms the headwaters of the Missouri River. How we treat the headwaters of any river is telling of what we value as a society.
9. As a police officer in West Yellowstone during the 1980's I saw a lot of things, from houses of ill repute and strip joints to illegal gambling to Hells Angels to riots to drunken bar fights. I've put people in jail and let people out. I've held people accountable.
10. The Yellowstone Club needs to be held accountable for polluting. Slapping the YC on the wrist with a daily fine is nothing for one of the wealthiest resort towns in the United States. Stopping the YC from accepting new sewer hook ups is the only thing that will send it the message that what it has done is not acceptable.
11. I have been on this Earth for more than seventy years. I have learned that some things are more important than money. Clean water is one of those things.

I declare under penalty of perjury that the foregoing is true and correct to the best of my knowledge.

Dated this 9th day of December, 2021.



Craig Matthews